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**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Care One Management, LLC et al.,

Plaintiffs,

-v-

United Healthcare Workers East, SEIU  
1199, et al.,

Defendants.

Civil Action No. 2:12-cv-06371-  
SDW-MAH

**DEFENDANTS' NOTICE OF  
MOTION FOR PARTIAL  
SUMMARY JUDGMENT**

**TO:** Rosemary Alito, Esq.  
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**PLEASE TAKE NOTICE** that in accordance with the Court's May 4, 2023 order (ECF No. 491), Defendants, through their attorneys Lowenstein Sandler LLP and Bredhoff & Kaiser PLLC, and 1199SEIU United Healthcare Workers East's

attorneys Levy Ratner P.C., will move before the Honorable Susan D. Wigenton, United States District Judge, at the United States District Court for the District of New Jersey, Newark, New Jersey for the entry of an Order granting partial summary judgment in favor of Defendants and against Plaintiffs, and entering judgment in favor of Defendants on Plaintiffs' state-law claims (Counts 7 and 8 of the Second Amended Complaint, ECF No. 242) and Plaintiffs' lost-acquisition damages claim, pursuant to Rule 56 of the Federal Rules of Civil Procedure.

**PLEASE TAKE FURTHER NOTICE** that in support of their Motion, Defendants shall rely upon the accompanying (1) Memorandum of Law in Support of their Motion for Partial Summary Judgment, (2) Statement of Undisputed Material Facts pursuant to Local Civil Rule 56.1, (3) Third Supplemental Declaration of Caitlin Kekacs and exhibits thereto, (4) Second Supplemental Declaration of Amy Gladstein, (5) Second Supplemental Declaration of David Pickus, (6) Second Supplemental Declaration of Leslie Frane, (7) Second Supplemental Declaration of Kirk Adams, and (8) Declaration of William Mantzoukas.

**PLEASE TAKE FURTHER NOTICE** that oral argument is requested.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of order is submitted herewith.

Respectfully submitted,

**LOWENSTEIN SANDLER LLP**

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Dated: June 23, 2023